

Wei-Drin Lee, AK Bar No. 0505025
James E. Torgerson, AK Bar No. 8509120
HELLER EHRMAN LLP
510 L Street, Suite 500
Anchorage, AK 99501-1959
Telephone: (907) 277-1900
Facsimile: (907) 277-1920

Attorneys for Defendant
THE GLIDDEN COMPANY, d/b/a ICI PAINTS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

MICHAEL INVESTMENTS, LLC,

Plaintiff,

vs.

THE GLIDDEN COMPANY, d/b/a ICI
PAINTS,

Defendant.

Case No. 3:05-cv-0223 (TMB)

**DECLARATION OF WEI-DRIN
LEE IN SUPPORT OF ICI'S
MOTION IN LIMINE TO
EXCLUDE EXPERT TESTIMONY
OF MICHAEL STAPLEFORD**

I, Wei-Drin Lee, declare:

1. I am an attorney with Heller Ehrman LLP, counsel for The Glidden Company, d/b/a ICI Paints (ICI) in this action. I am admitted to practice before this Court. I make this declaration on personal knowledge in support of ICI's Motion in Limine to Exclude the Expert Testimony of Michael Stapleford.

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's Disclosure of Expert Witness dated October 13, 2006.

3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the Responses to Defendant's Discovery Requests to Plaintiff Dated September 27, 2006 which are dated October 23, 2006.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the Draft Transcript of the November 15, 2006, deposition of Michael Stapleford.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 27, 2006.

s/ Wei-Drin Lee

Wei-Drin Lee

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing DECLARATION OF WEI-DRIN LEE IN SUPPORT OF ICI'S MOTION IN LIMINE TO EXCLUDE EXPERT TESTIMONY OF MICHAEL STAPLEFORD has been sent via ☐ Facsimile ☐ Regular U. S. Mail ☐ Hand Delivery ☒ Electronically this 27th day of November, 2006, to:

David H. Shoup
TINDALL BENNETT & SHOUP, PC
508 W. 2nd Ave., 3rd Floor
Anchorage, AK 99501
Facsimile: 278-8536
e-mail: shoup@tindall-law.com

s/Wei-Drin Lee

Wei-Drin Lee

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